

HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

WSOU INVESTMENTS, LLC d/b/a BRAZOS  
LICENSING AND DEVELOPMENT, a  
Delaware limited liability company,

Plaintiff,

v.

F5 NETWORKS, INC., a Washington  
Corporation,

Defendant.

No. 2:20-cv-01878-BJR

**ANSWER TO COUNTERCLAIMS**

Plaintiff and Counter-Defendant WSOU Investments, LLC d/b/a Brazos Licensing and Development (“WSOU”) by and through its counsel of record, hereby submits its Answer in response to the allegations set forth in Defendant F5 Networks, Inc.’s (“F5”) Counterclaims (Dkt. 58) (“Counterclaims”) as follows:

**GENERAL DENIAL**

Unless specifically admitted below, WSOU denies each and every allegation in the Counterclaims.

**The Parties**

1. WSOU admits the allegations of paragraph 1 on information and belief.
2. WSOU states that it is a Delaware limited liability company, and admits that its

PLAINTIFF’S ANSWER TO COUNTERCLAIMS– 1  
(CASE NO. 2:20-cv-01878-BJR)

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1 principal place of business is located at 605 Austin Avenue, Suite 6, Waco, Texas 76701. Except  
2 as expressly admitted, WSOU denies the remaining allegations of paragraph 2.

3 **Jurisdiction and Venue**

4 3. WSOU admits that the Counterclaims purport to arise under the patent laws of the  
5 United States. WSOU admits that this Court has subject matter jurisdiction over the  
6 Counterclaims. Except as expressly admitted, WSOU denies the allegations of paragraph 3.

7 4. WSOU admits that it is subject to personal jurisdiction in this Court. Except as  
8 expressly admitted, WSOU denies the remaining allegations of paragraph 4.

9 5. WSOU admits that venue is proper in this District. Except as expressly admitted,  
10 WSOU denies the remaining allegations of paragraph 5.

11 **COUNT I**

12 **Declaration of Non-Infringement of the '884 Patent**

13 6. WSOU admits that an actual and justiciable controversy exists between F5 and  
14 WSOU. Except as expressly admitted, WSOU denies the remaining allegations of paragraph 6.

15 7. WSOU denies the allegations of paragraph 7.

16 8. WSOU admits that F5 purports to seek a declaration of non-infringement of the  
17 '884 Patent. Except as expressly admitted, WSOU denies the remaining allegations of  
18 paragraph 8.

19 **COUNT II**

20 **Declaration of Invalidity of the '884 Patent**

21 9. WSOU admits that an actual and justiciable controversy exists between F5 and  
22 WSOU. Except as expressly admitted, WSOU denies the remaining allegations of paragraph 9.

23 10. WSOU denies the allegations of paragraph 10.

24 11. WSOU admits that F5 purports to seek a declaration of invalidity of the '884  
25 Patent. Except as expressly admitted, WSOU denies the remaining allegations of paragraph 11.

**JURY DEMAND**

WSOU demands a jury trial on all issues raised by F5's Counterclaims.

## **PRAYER FOR RELIEF**

WSOU hereby incorporates by reference the foregoing paragraphs of this Answer as if fully set forth herein. WSOU denies that F5 is entitled to the relief requested in paragraphs a-g of its Prayer for Relief and denies the allegations therein.

## CORR CRONIN LLP

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**PLAINTIFF'S ANSWER TO COUNTERCLAIMS– 4  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 19, 2021, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

s/ Christy A. Nelson

Christy A. Nelson